

From: Howell, Megan [mailto:Megan.Howell@firstdata.com]
Sent: Wednesday, April 25, 2018 12:46 PM
To: Bill Botzow; Michael Marcotte
Cc: Liz Raddock
Subject: SB 206: Follow-up & Suggested Changes
Importance: High

Good afternoon Chairman Botzow and Vice Chairman Marcotte,

I would like to provide some follow-up information on the Independent Sales Organizations (ISO) per our discussion on Friday. Regarding the questions about vetting, we do have a process in place prior to working with an ISO. Our ISO partners are vetted for financial, operational, and reputational risk. They are also reviewed at least annually for similar criteria to ensure these factors remain satisfactory.

Additionally, for ISO monitoring, there is a team that works on this and from an accountability perspective if an ISO presents a reputational concern, then action may be taken against that ISO. For example, terminating the contract or preventing an ISO from signing up new merchants.

Additionally, as you continue to evaluate the bill I thought it may be helpful to send suggestions for changes to the text that would modify the bill to align with how the leasing sales structure operates while maintaining disclosures for businesses.

Thank you for your consideration of our suggestions.

Best,

Megan Howell